

**Performance Audit  
Kansas City, Missouri Police Department:  
Video Records Management**

January 2013

**City Auditor's Office  
City of Kansas City, Missouri**



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HEART OF THE NATION



KANSAS CITY  
MISSOURI

## Office of the City Auditor

21<sup>st</sup> Floor, City Hall  
414 East 12<sup>th</sup> Street  
Kansas City, Missouri 64106

(816) 513-3300  
Fax: (816) 513-3305

January 15, 2013

Honorable Mayor, Members of the City Council, and Members of the Board of Police Commissioners:

This performance audit of the Kansas City, Missouri Police Department's video records management was initiated by the city auditor pursuant to Article II, Section 216 of the city charter and Section 84.350.2 of the Revised Statutes of Missouri at the request of the Board of Police Commissioners. The audit focuses on how the Police Department manages its video records.

The Police Department has written policies covering operational and technical aspects of the department's video systems but no overarching department-wide policy for managing video records. This increases the risks that staff may not be aware of department requirements associated with video records, video records may not be properly handled, or instructions for managing video records may be inadequate.

There are some inconsistencies between the state records retention schedules and department practices and written policies as well as conflicting instructions between the department's written policies, increasing risks that video records could inadvertently be destroyed or retained longer than needed. The department has no off-site archival or disaster recovery back-up for the video system programs and video records maintained on computer servers in the headquarters building, increasing the risk that critical video system programs and video records could be lost or destroyed.

The department also lacks standards or minimum performance specifications for video systems and video equipment, increasing the risk the department could purchase video systems or equipment that are incompatible with current video assets and video records or do not meet department video needs. The department has practices and controls in place to protect the integrity of video records, however, including these practices in a written policy and procedure would strengthen the department's internal controls over video records.

We make recommendations to improve video records management through the development and communication of a comprehensive video records management policy, an off-site storage plan to provide archival and system back-up for disaster recovery, standards or minimum specifications for video system and equipment purchases, and written policies detailing how the department protects the integrity of its video records.

We shared a draft of this report with the chief of police on November 2, 2012. His response is appended. We would like to thank the Kansas City, Missouri Police Department staff for their assistance and cooperation. The audit team for this project was Vivien Zhi and Douglas Jones.

A handwritten signature in black ink, reading "Gary L. White". The signature is written in a cursive, flowing style.

Gary L. White  
City Auditor

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# Kansas City, Missouri Police Department: Video Records Management

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## Introduction

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### Objective

We conducted this audit of the Kansas City, Missouri Police Department's video records management under the authority of Article II, Section 216 of the Charter of Kansas City, Missouri, which establishes the Office of the City Auditor and outlines the city auditor's primary duties. We also conducted the audit under the authority of Section 84.350.2 of the Revised Statutes of Missouri, which authorizes the city auditor to audit the Police Department.

A performance audit provides assurance or conclusions based on an evaluation of sufficient, appropriate evidence against stated criteria. Performance audits provide objective analysis so that management and those charged with governance and oversight can use the information to improve program performance and operations, reduce costs, facilitate decision making, and contribute to public accountability.<sup>1</sup>

This report is designed to answer the following question:

- How does the Kansas City, Missouri Police Department manage video records?

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### Scope and Methodology

Our review focuses on how the Kansas City, Missouri Police Department manages videos recorded by police officers and the department's video systems installed in police cars, patrol stations, and other department facilities. Our audit methods included:

- Interviewing department staff to identify policies, procedures, and practices to understand the types of video systems used, and how the video systems and video records are managed.
- Reviewing state records retention schedules to identify requirements related to video records management for comparison with the department's policies, procedures, and practices.

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<sup>1</sup> Comptroller General of the United States, *Government Auditing Standards* (Washington, DC: U.S. Government Printing Office, 2007), p. 17.

- Reviewing professional literature to identify audit criteria and recommended practices for comparison with the department's policies, procedures, and practices.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. No information was omitted from this report because it was deemed privileged or confidential.

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## **Background**

On a daily basis, police officers and the department's video systems record video records of hundreds of events or activities. Police video records can be an important piece of evidence for police investigations and criminal court cases. The ability to capture, process, share, manage, and maintain police video records can be critical to the success of a criminal investigation or prosecution.

### **Police Department Video Systems**

The Police Department's Patrol Bureau uses the COBAN in-car video system to record patrol officer activities. The video system can be manually activated by officers inside the police car or outside the police car by turning on their microphone that is synchronized with the video system. The in-car video system also automatically activates when the lights and sirens are on or when the police car goes faster than 80 mph. The in-car video system can only be turned off manually from inside the police car. Video records from this system are managed by the bureau's Patrol Video Unit<sup>2</sup> and this unit is also the system administrator for COBAN.

Video cameras installed at patrol stations, the headquarters building, and other department facilities record activities and events in public areas as well as the detention units. Two video surveillance systems are used; INTELLEX is the department's older system and CISCO is the newer system used in new stations and facilities. These video surveillance systems operate 24-hours a day. The Patrol Video Unit manages the

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<sup>2</sup> The Patrol Video Unit was transferred from the Patrol Bureau to the Administration Bureau in August 2012, and is now the Digital Technology Section. For the purposes of this audit, we use Patrol Video Unit.



video records from the patrol stations and the Executive Services Bureau manages video records from the headquarters detention unit. Videos from other department facilities are managed by the bureau or division responsible for the facility.

Police interviews and interrogations associated with investigations are video recorded using the INSIGHT system. This is a manual system which has to be turned on by police officers to record an interview or interrogation. The Investigations Bureau manages interview and interrogation videos.

The Administration Bureau's Information Technology Unit is responsible for maintaining the Police Department's computer systems and the programs used to record videos. This unit is also the system administrator for the INSIGHT, CISCO, and INTELLEX systems.

The Police Department's video taskforce is discussing how to manage the department's video assets and possible consolidation of the department's video records responsibilities.

### **State Records Retention Requirements**

The Missouri Secretary of State notes that records are records, regardless of format, and the same policies, procedures, and retentions apply.<sup>3</sup> The Police Clerks section of the state's Local Records Retention Schedule has two retention schedules that apply to the Police Department's video records. (See Exhibit 1.) The Police Clerks section also notes that any record that becomes part of an investigation file or report must follow the retention requirements of investigative files.

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<sup>3</sup> Office of the Missouri Secretary of State, Local Records Preservation Program, Missouri State Archives, *Missouri Local Government Records Management Guidelines*, May 2011, p. 15.

Exhibit 1. Police Clerks Records Retention Schedule – Audio/Video Records and Incident Report/File

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POL 011	Audio/Video Recordings (Car Audio/Video recording; Booking Surveillance; Surveillance)
<i>Retention:</i>	30 Days--Evaluate* *Managers should extract significant information that may impact criminal or major case investigation prior to deleting video/re-using the tape. Extracted video must be retained until administrative/judicial proceedings are complete. This retention does not apply to interrogation videos which are by their nature evidentiary and should be part of the investigative files—See POL001.

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POL 001	Incident Report/File (Offense Report; Police Report; Investigative Report; Supplemental Report; Case File; Robbery Photo File; Citations; Tickets; Controlled Substance Test Report; Evidence Sheet)
<i>Retention:</i>	If case is filed, retain until final disposition; If no charges are filed: Class A felony, Permanent; Other felony, 3 years; Sex crime involving minor, 30 years after victim reaches 18; Misdemeanor, 1 year; Infraction, 6 months. May include Juvenile or other confidential files.

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Source: Missouri Local Records Retention Schedule – Police Clerks Records Retention Schedule.

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## Findings and Recommendations

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### Risks to Video Records Could Be Reduced

The inconsistent nature of the Police Department's current policies and the lack of a department-wide video records management policy increase the risk staff may not be aware of department requirements or state retention requirements, that video records may not be properly handled, or instructions for managing video records may be inadequate. Recommended practices suggest that agencies have a comprehensive video records management policy that includes procedures covering the use, storage, and handling of video evidence.

There are some inconsistencies between practices, policies, and state requirements as well as conflicting procedures between the department's written policies. Without a clear written video records retention policy, there is an increased risk that records could inadvertently be destroyed or retained longer than required by state records retention schedules.

The department does not have an off-site archival or disaster recovery back-up for the video system programs and video records maintained on computer servers in the headquarters building. The lack of an off-site archival and disaster recovery back-up increases the risk that critical video system programs and records could be lost or destroyed.

The department does not have standards or minimum performance specifications for video recording systems and video equipment. Without standards or minimum performance specifications there is an increased risk the department could purchase video systems or video equipment that are incompatible with current video assets and video records or that do not meet department video needs.

While not included in a written policy, the department has practices and controls in place to protect the integrity of video records. Including these practices in a written policy and procedure would strengthen the department's internal controls over video records.

Although police officers receive formal training to use the in-car video system, staff responsible for video systems and records were concerned that police officers may not always be aware of the department's various video records requirements or how to handle video records. A lack of awareness by department staff increases the risk that video records may not be properly handled.

### **No Department-Wide Video Records Management Policy**

The Police Department does not have an overarching policy for managing video records. The department has an array of written policies that cover operational or technical aspects of the video systems such as the type of events to record using the in-car camera system, how to put a 'hold' on a video record, video system configuration, and how to replace a mobile hard drive. Although these policies are in procedural instructions, department memorandums, bureau memorandums, unit manuals, etc., none of them outline a general or overarching department-wide policy for managing video records or video assets.

The Local Government Records Management Guidelines issued by the Missouri Secretary of State notes that adopting a written records management policy is important. Recommended practices reinforce the importance of written policies and procedures for video records and suggest that agencies have a comprehensive video records management policy that includes procedures covering collection, use, storage, and handling of video evidence as well as training.<sup>4</sup>

The lack of an overall video records management policy and the inconsistent nature of the department's current policies and video records administration increase the risk that staff may not be aware of state records retention schedules and department requirements, video records may not be properly handled, or instructions for managing video records may be inadequate. To improve how video records are collected and managed, the police chief should develop a department-wide video records management policy.

### **Video Records Retention Timeframes Vary**

Video records retention timeframes vary among bureaus in the Police Department and are often unwritten practices. Although staff said they follow state records retention schedules, there are some inconsistencies.

**Patrol Bureau - Patrol Video Unit.** Staff in the Patrol Video Unit said they follow the state records retention schedule regarding in-car and surveillance video records. They reported the department does not have a written video records retention policy, but there is an unwritten retention policy for in-car video records of two years. Staff also said some in-car video records are held longer than two years because they are related to an investigation and the department does have written

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<sup>4</sup> International Association of Chiefs of Police (IACP), *The Impact of Video Evidence on Modern Policing: Research and Best Practices from the IACP Study on In-Car Cameras*, 2005, pp. 28, 30. International Association of Chiefs of Police, *Technology Technical Assistance Program 01: In-Car Cameras*, 2006, pp. 57, 67.

policies and procedures to request and manage these ‘held’ videos. Patrol Video Unit staff also reported that the video surveillance systems used in the patrol stations keep video records for about 60 days and video records older than 60 days are recorded over. The state records retention schedule only requires in-car videos and surveillance videos be retained for 30 days unless the videos have information that may impact an investigation.

The video records retention policy in a department memorandum conflicts with a policy in a procedural instruction. Department Memorandum 11-4: Patrol Video, Cisco Surveillance and Insight Interrogation Video Systems at Patrol Division Stations-Requests for Duplication states that “Patrol vehicle videos will be held for two (2) years and all other videos outlined in this department memorandum are retained for 60 days.” Procedural Instruction 10-9: Patrol Bureau Video Procedures states that “All Patrol Bureau recordings will be retained as specified in the Missouri Police Clerks Records Retention Schedule.”

In addition to an inconsistency between department policies, the written policy of retaining interrogation videos for only 60 days is inconsistent with the state records retention schedule. The state records retention schedule sets varying retention periods, ranging from 6 months to permanent retention, for video records that are part of an investigative file, depending on the nature of the offense and whether a case has reached final disposition.

**Executives Services Bureau - Headquarters Detention Unit.** Staff in the Headquarters Detention Unit said they follow the state records retention schedule regarding video records. Staff also reported the Headquarters Detention Unit video system keeps surveillance videos for about six months and newer videos are recorded over older videos. The Detention Unit Duty Manual does not address video records retention. The state records retention schedule only requires surveillance videos be retained for 30 days unless the videos have information that may impact an investigation.

**Investigations Bureau.** Investigations Bureau staff said they follow departmental policies and procedures regarding records retention. Interrogation and interview videos are stored on the department’s main server and also copied to two DVDs (one in the case file and a second sent to the evidence room). According to the department’s Information Technology Unit staff, interrogation and interview videos are stored indefinitely on the department’s servers. The state records retention schedule has varying retention periods, ranging from 6 months to permanent retention, for video records that are part of an investigative

file, depending on the nature of the offense and whether a case has reached final disposition.

Although department staff said that the state records retention schedule is followed, the department's written policies do not always address this. In addition, the department's practice is to retain video records beyond the minimum state requirements. Although state records guidelines caution against unnecessary records retention, exceeding state records retention requirements is permissible, but without a clear written policy, department staff may not be aware of how long video records must be retained and records could inadvertently be destroyed before the retention period is over or records could be retained longer than needed.

To ensure that Police Department video records are retained in accordance with state and department requirements, the police chief should develop written department-wide video records retention schedules that meet the minimum state requirements or the department's requirements when they exceed state requirements.

### **Video System Programs Do Not Have Off-Site Back-Up**

Information Technology staff reported the department does not have an off-site archival or disaster recovery back-up for the department's interrogation and in-car video system programs or for a large number of videos maintained on the Storage Area Network (SAN) in the headquarters building. The records management guidelines issued by the Missouri Secretary of State note that disaster prevention should be a high priority. The state guidelines recommend that if CDs/DVDs are used for storage, multiple copies should be made, one copy should be stored off-site, and a data migration plan to refresh or transfer data to new CDs/DVDs every 5 to 10 years should be in place.<sup>5</sup> Other recommended practices contained similar information and also encouraged a secondary, off-site storage facility to provide active, archival, and system back-up for disaster recovery.<sup>6</sup>

The video system programs, interrogation and interview videos, and between 4 to 12 months of in-car videos could be lost if something happened to the SAN. The DVD copies of interrogations and interviews mitigates the potential loss of these videos that are stored on the server, but DVDs are subject to media decay over time. Also, the Patrol Video Unit downloads older in-car video records to a magnetic tape storage unit

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<sup>5</sup> *Missouri Local Government Records Management Guidelines*, pp. 13 and 16.

<sup>6</sup> International Association for Identification Scientific Working Group on Imaging Technology (SWGIT), *Best Practices for Archiving Digital and Multimedia Evidence in the Criminal Justice System*, 2012, p. 1. IACP, *Digital Video Systems Minimum Performance Specifications Version 14*, November 11, 2008, p. 32.

for at least two years, so only newer video records would be lost if the SAN failed. With both the SAN and magnetic tape storage unit located at the headquarters building, if a disaster struck the headquarters building the information on both types of storage systems could be lost. The lack of an off-site archival and disaster recovery back-up increases the risk that critical video system programs and records could be lost or destroyed.

To ensure that critical Police Department video system programs and video records are not lost or destroyed in the event of a disaster, the police chief should develop an off-site storage plan to provide archival and system back-up for disaster recovery of the department's video system programs and video records.

### **Standards for Video Systems and Equipment Are Needed**

Staff in the Information Technology Unit and Patrol Video Unit said the department does not have standards or minimum performance specifications for the types of video systems and video equipment purchased by the department. Recommended practices include information ranging from requirements such as warranties to technical specifications such as image resolution that agencies should consider when purchasing video systems and video equipment.<sup>7</sup>

The lack of standards or minimum performance specifications for systems and equipment increases the risk the department could purchase video system programs or video equipment that are incompatible with current video assets and video records or that do not meet department video needs.

To ensure that current and future video system programs and equipment are compatible and meet the department's video needs, the police chief should develop standards and minimum performance specifications for video system programs and video equipment used by the department.

### **Controls Are in Place to Protect the Integrity of Video Records**

The Police Department has several controls in place to protect and maintain the integrity of video records. Recommended practices suggest that agencies have written policies and methods in place that include controls over the physical and logical access to video systems and video records through locked, restricted access facilities; user names and

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<sup>7</sup> IACP, *The Impact of Video Evidence on Modern Policing: Research and Best Practices from the IACP Study on In-Car Cameras*, 2005, Part 2: Sample Bid Specifications. *Digital Video Systems Minimum Performance Specifications Version 14*, pp. 15-18.

passwords; and the use of audit trails or system logs to record user activity in the system.<sup>8</sup>

Although not included in a written policy, the department's practices incorporate recommended practices. The department's servers for the Storage Area Network are located in a locked, restricted access room at the headquarters building and servers located in patrol stations are kept in locked cabinets. System administrators grant access to the video systems through user names and passwords. The systems allow administrators to grant different levels of access; patrol officers are able to view only their in-car videos while staff in the Patrol Video Unit are able to view and make copies of all in-car videos. System administrators are also able to review audit trails or system logs to review user activity as needed.

Recommended practices also include suggestions for demonstrating the integrity of video records through the use of a 'hashing' function, which is a mathematical formula that generates a unique number (hash value) used to substantiate the integrity of digital evidence.<sup>9</sup> The hash values between an original file and a copied file can be compared to identify even small changes to a record. The interrogation and in-car video systems use a hashing function and IT unit staff said the hashes give them a way to track access and activities associated with the video records in those systems.

To further strengthen controls over video records, the police chief should develop written policies and procedures outlining how the department protects the integrity of its video records.

### **Video Records Requirements May Not Be Understood by All Staff**

Although a department memorandum issued in 2004, discusses the use of personal and department cameras, staff we spoke with said they were concerned that police officers in the field may not be aware of the department's video records requirements or how to handle video records. We asked Police Academy staff about the curriculum related to video records and were told recruits receive instructions on using the in-car video system, but no general instruction regarding the department's other

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<sup>8</sup> Law Enforcement and Emergency Services Video Association (LEVA), *Best Practices for the Acquisition of Digital Media Evidence*, April 14, 2010, p. 6. *Digital Video Systems Minimum Performance Specifications Version 14*, p. 33. *Best Practices for Archiving Digital and Multimedia Evidence in the Criminal Justice System*, p. 2. *Best Practices for Maintaining the Integrity of Digital Images and Digital Video*, p. 2.

<sup>9</sup> *Best Practices for Maintaining the Integrity of Digital Images and Digital Video*, p. 3. IACP, *Technology Technical Assistance Program 01: In-Car Cameras*, 2006, p. 120. *Digital Video Systems Minimum Performance Specifications Version 14*, pp. 5, 29.



video systems or other types of video records. The Missouri Local Government Records Management Guidelines note that everyone associated with generating and accessing records should be familiar with the agency's records policies.<sup>10</sup>

To reduce the risk that video records are improperly handled by Police Department staff, the police chief should ensure that the department's video records management policies and procedures are communicated to staff responsible for generating, accessing, and disposing of video records.

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## Recommendations

1. The chief of police should develop a department-wide video records management policy that, at a minimum, includes written procedures addressing:
  - records retention schedules that meet the minimum state requirements or the department's requirements when they exceed state requirements,
  - an off-site storage plan to provide archival and system back-up for disaster recovery of the department's video systems and video records,
  - standards or minimum performance specifications for video systems and video equipment used by the department, and
  - how the department protects the integrity of its video records.
2. The chief of police should ensure that the department's video records management policies and procedures are communicated to staff responsible for generating, accessing, and disposing of video records.

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<sup>10</sup> *Missouri Local Government Records Management Guidelines*, p. 6.



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## **Appendix**

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### **Police Chief's Response**



# Police

KC/MO

Darryl Forté  
Chief of Police



## Headquarters Building

1125 Locust  
Kansas City, Missouri 64106  
[www.kcpd.org](http://www.kcpd.org)

(816) 234-5000

December 13, 2012

Mr. Gary White  
Office of the City Auditor  
21<sup>st</sup> Floor, City Hall  
414 E. 12<sup>th</sup> St.  
Kansas City, MO 64106

Dear Mr. White,

The Audit of the Video Records Management by the City of Kansas City, Missouri's Auditors Office has been extremely well received and I agree with both of the recommendations outlined in the audit. The Kansas City, Missouri Police Department is strongly involved in internal and external audits, knowing that continued improvement in the management and processes of systems ensures improved efficiency and effective use of resources.

The Video Records Management Audit listed the following two recommendations:

**Recommendation 1:** The Chief of Police should develop a department wide video records management policy that, at a minimum, includes written procedures addressing:

- Records retention schedules that meet the minimum state requirements or the department's requirements when they exceed state requirements.
- An off-site storage plan to provide archival and system back-up for disaster recovery of the department's video system and video records.
- Standards or minimum performance specifications for video systems and video equipment used by the department.
- How the department protects the integrity of its video records.

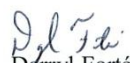
**Recommendation 2:** The Chief of Police should ensure that the department's video records management policies and procedures are communicated to staff responsible for generating, accessing and disposing of video records.

Under the direction of the Chief of Police and the recommendation of the KCPD Executive Staff, a Video Records Management Committee was formed in January of 2012. The Video Records Management Committee, renamed the Digital Technology Committee has representatives from the Patrol Bureau, Office of General Counsel, Information Services Division, Regional Criminalistics Division, Violent Crimes Division, and the Research and Development Division. The committee is chaired by the Division Commander of the Information Services Division.

Based upon these weekly meetings of the Digital Technology Committee, the following actions have taken place over the past year that are directly related to the two recommendations given by the City of Kansas City, Missouri's video Records Management Audit:

1. The Patrol Video Unit has been moved under the Information Services Division and is now the responsible unit for all digital technology, which includes all video systems, devices, storage and integrity of systems for the COBAN, INSIGHT and CISCO systems.
2. The Digital Technology Committee members from the Research and Development Division are preparing one overarching policy that will be used as the department guideline for all video/digital systems. This new policy will incorporate over 15 department policies and memorandums that are currently in effect.
3. The records retention schedule as established by the Missouri Secretary of State's office will be included in the Digital Technology Policy and all storage and retention policies will reflect the necessary standard.
4. An off-site storage and or disaster recovery site has been part of the committees planning phase. This will require coordination with the Capital Improvement Division as well as Information Services Division input. This recommendation will require funding for the proper system storage.
5. The Chief of Police will ensure that video records management policies are communicated to the staff responsible for generating, accessing and disposing of video records through policy, training and accountability. In-Service Training scheduled for calendar year 2013 will include all of these factors for every member of the Kansas City, Missouri Police Department.

The Kansas City, Missouri Police Department is determined to continue with successful and accountable approaches to ensure compliance with the Audit's recommendation. An internal audit of the Digital Technology processes will also be recommended, to ensure all recommended measures have been completed.

  
Darryl Forté  
Chief of Police